



**THIRD DEFENSE**

Cameron Harris states that if the subject property is judicially foreclosed, then Cameron Harris is entitled to be paid for the amount of its lien on the subject property. Cameron Harris affirmatively states that it holds a lien on the subject property in the amount of \$65,473.30 and is entitled to be paid from any judicial foreclosure and sale thereof.

**FOURTH DEFENSE**

Cameron Harris has done no wrong.

**FIFTH DEFENSE**

No action by Cameron Harris was the proximate cause of injury to the Defendant/Counterclaim Plaintiff.

**SIXTH DEFENSE**

No action by Cameron Harris was the actual cause of injury to the Defendant/Counterclaim Plaintiff.

Cameron Harris reserves the right to assert additional defenses as discovery progresses in this case.

Respectfully submitted,

/s/ Janine L. Smith

D. Christopher Carson  
Janine L. Smith

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 26th day of June, 2006, I electronically filed the foregoing with the Clerk of the Court using the ECF system which sent notification of such filing to all properly registered parties and, to the extent they are not properly registered with the Court's ECF system, they have been served by directing same to their office addresses via first-class, United States mail, postage prepaid:

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